

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TELCORDIA TECHNOLOGIES, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 04-876-GMS
CISCO SYSTEMS, INC.,)	
)	
Defendant.)	

**PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S
OBJECTIONS TO DEFENDANT CISCO SYSTEMS, INC.'S
NOTICE OF DEPOSITION OF JOSEPH GIORDANO**

Plaintiff Telcordia Technologies, Inc. ("Telcordia"), by its attorneys, hereby objects to Defendant Cisco Systems, Inc.'s ("Cisco") Notice of Deposition of Joseph Giordano.

OBJECTIONS

1. Telcordia objects to the time and location of the deposition. Telcordia will work with Cisco to schedule the deposition at a mutually agreeable time and place.
2. Telcordia objects to the use, including use by other parties, of any testimony from the noticed deposition in separate cases, such as the pending suits against Lucent and Alcatel (Telcordia Technologies, Inc. v. Lucent Technologies, Inc. Civil Action No. 04-875-GMS and Telcordia Technologies, Inc. v. Alcatel USA, Inc., Civil Action No. 04-874-GMS).
3. Telcordia objects to the extent that this deposition in combination with depositions of other witnesses would cause Cisco to exceed any of the limits on depositions set forth in the Federal Rules of Civil Procedure.

4. Telcordia objects to the extent that this deposition seeks information that is protected by claims of attorney-client privilege or attorney work product in light of Joseph Giordano's work as a lawyer for Telcordia.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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Dated: March 24, 2006
167958.1

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of March, 2006, the attached **PLAINTIFF
TELCORDIA TECHNOLOGIES, INC.'S OBJECTIONS TO DEFENDANT CISCO
SYSTEMS, INC.'S NOTICE OF DEPOSITION OF JOSEPH GIORDANO** was served
upon the below-named counsel of record at the address and in the manner indicated:

Jack B. Blumenfeld, Esquire
Morris, Nichols, Arsht & Tunnell
1201 North Market Street
Wilmington, DE 19899-1347

HAND DELIVERY

Matthew D. Powers, Esquire
Weil, Gotshal & Manges LLP
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Redwood Shores, CA 94065

VIA ELECTRONIC MAIL

/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon